

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ESTATE OF
ROGER D. OWENSBY JR., ET AL.,

Case No. 01-CV-769

Plaintiff,

Senior Judge S. Arthur Spiegel

v.

CITY OF CINCINNATI, ET AL.,

Defendants.

**PLAINTIFFS' NOTICE OF DEPOSITION
OF RULE 30(b)(6) REPRESENTATIVE(S) OF
DEFENDANT CITY OF CINCINNATI**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6), Fed. R. Civ. P.,

Plaintiffs will take the deposition of the most knowledgeable person or persons for defendant City of Cincinnati concerning the following matter:

The person most knowledgeable concerning the documents produced by the City of Cincinnati, bearing the bates labels C000064-66, attached. Based upon the City of Cincinnati's correspondence of November 20, 2003, Plaintiff believes that this designated person will be Mr. Alan Goldschmidt of the Regional Crime Information Center.

In accordance with Fed. R. Civ. P. 30(b)(6), defendant City of Cincinnati is instructed to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf concerning the matters set forth above. The person or persons so designated shall testify as to matters known or reasonably available to the City of Cincinnati.

Eth. 109

The deposition(s) shall be held on December 19, 2003 at the law offices of Helmer, Martins & Morgan Co., L.P.A., Fourth & Walnut Centre, Suite 1900, 105 East Fourth Street, Cincinnati, Ohio, beginning at 10:00 a.m. The deposition(s) will be recorded stenographically. You are invited to attend.

Respectfully submitted,



Paul B. Martins

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served, this 24th day of November, 2003, via ordinary U.S. Mail upon the following:

Neil F. Freund
 Vaseem S. Hadi
 FREUND, FREEZE & ARNOLD
 One Dayton Centre
 One South Main Street, Suite 1800
 Dayton, Ohio 45402-2017
Trial Counsel for Defendants
City of Cincinnati and Thomas Streicher, Jr.

Geri Hernandez Geiler
 Julie F. Bissinger
 Assistant City Solicitors
 Room 214, City Hall
 801 Plum Street
 Cincinnati, Ohio 45202
Trial Attorney for Defendants
City of Cincinnati and Thomas Streicher, Jr.,
David Hunter, Darren Sellers, Jason Hodge
and Cincinnati Police Officers John Does 1
through 6

Mark T. Tillar
 224 Clark Road
 Cincinnati, Ohio 45215
Trial Attorney for Plaintiff

John J. Helbling
 3672 Springdale Road
 Cincinnati, Ohio 45251
Trial Attorney for Plaintiff

Donald E. Hardin
 HARDIN, LEFTON, LAZARUS & MARKS, LLC
 915 Cincinnati Club Building
 30 Garfield Place
 Cincinnati, Ohio 45202
Trial Attorney for Defendants Robert B. Jorg,
Patrick Caton, Darren Sellers, Jason Hodge,
and Victor Spellen

Wilson G. Weisenfelder, Jr.
 RENDIGS, FRY, KIELY & DENNIS, LLP
 900 Fourth & Vine Tower
 Cincinnati, Ohio 45202
Trial Attorney for Defendants City of Golf Manor
Stephen Tilley, Roby Heiland, and
Chris Campbell

Dale A. Stalf
 BUCKLEY, KING
 1420 PNC Center
 Cincinnati, Ohio 45202
Counsel for Defendants Huntington Meadows LTD
and Bryan Menefee

Ravert J. Clark
 114 East Eighth Street
 Suite 400
 Cincinnati, Ohio 45202
Trial Attorney for Defendant David Hunter



Paul B. Martins

Memo

Date: 11/13/2000
To: Darlene Lacke
Cc: Cincinnati Police
From: Mike Neumann ,Regional Crime Information Center
RE: CTLNO 1743019

Tracking on Ctlno 1743019 for the last six months

MJN/mjn

C000064

ERGO REPORT

FILTERING: LOCAL-CTLNO = 1743019

M D Y T FUNCTION TRANS ACTUAL RACS-ID

5	1	0	1220	QW	CRBD	CRBD	JMCKIERN
5	2	0	225	QHW	CH01	CH01	TPUSER
5	3	0	827	QW	CRBD	CRBD	RKISSING
5	4	0	1221	QW	CCBD	CCBD	RSTRATTO
5	6	0	2224	MDT	9R25		
5	6	0	2224	MDT	9R25		
5	6	0	2224	MDT	9R25		
5	6	0	2224	MDT	9R25		
6	6	0	730	QPS	PB29	PB29	LSCHNEID
6	6	0	1547	QHW	DPR3	DPR3	MCOMARAT
6	6	0	1548	QPS	DPR3	DPR3	MCOMARAT
6	8	0	716	QPS	PB29	PB29	LSCHNEID
6	21	0	1436	QHW	DPR3	DPR3	MCOMARAT
7	6	0	1413	QHW	DPR3	DPR3	MCOMARAT
7	21	0	1324	QHW	DPR3	DPR3	MCOMARAT
10	7	0	1743	MDT	3915		
10	7	0	1743	MDT	3915		
10	13	0	457	MDT	4351		
10	13	0	514	QPS	DST4	DST4	DJORDAN
10	13	0	618	QW	CWU4	CWU4	TAULL
10	13	0	826	QPS	CWU9	CWU9	SFERGUSO
10	13	0	835	QW	CWU4	CWU4	KFREY1
10	13	0	844	QHW	C348	C348	KTRUE
10	13	0	844	QPS	C348	C348	KTRUE
10	13	0	844	QJ06	C348	C348	KTRUE
10	13	0	950	QHW	C302	C302	KTRUE
10	13	0	951	QHW	C302	C302	KTRUE
10	13	0	1055	QPS	PT04	PT04	APOLI
10	13	0	2348	IQW	CT35	CT28	MROWEKAM
10	14	0	508	IQW	CWU6	CWU6	JPATTERS
10	14	0	621	QHW	CWU4	CWU4	JPATTERS
10	14	0	1130	QPS	C313	C313	EBLESKA
10	16	0	543	IQW	CWU4	CWU4	LWALTERS
10	17	0	704	QCH	CCID	CCID	HCHADWIC
10	17	0	1038	QRA	PRS6	PRS6	ASCHULZI
10	17	0	1357	QPS	CVCS	CVCS	DKELLY
10	23	0	1807	QPS	C310	C310	RRUZSA
10	23	0	1807	QHW	C310	C310	RRUZSA
10	25	0	1114	QPS	PRSC	PRSC	VBRYANT
10	25	0	2329	QHW	DST4	DST4	AHASSE
10	25	0	2330	QPS	DST4	DST4	AHASSE
10	25	0	2330	QPS	DST4	DST4	AHASSE
10	27	0	751	QRA	CRB3	CRB3	JBJERS
11	3	0	24	MDT	4351		
11	3	0	26	MDT	4351		
11	3	0	1047	QHW	PRSL	PRSL	MPRIESTL
11	3	0	1048	QPS	PRSL	PRSL	MPRIESTL
11	7	0	2010	MDT	4265		
11	7	0	2018	QHW	IDEN	IDEN	GVENTRE
11	7	0	2019	QPS	IDEN	IDEN	GVENTRE
11	7	0	2021	MDT	4252		
11	7	0	2131	MDT	4230		
11	7	0	2131	MDT	4230		
11	7	0	2133	MDT	4230		
11	7	0	2136	MDT	4240		
11	7	0	2138	MDT	4240		
11	7	0	2138	MDT	4240		
11	7	0	2151	QHW	CRBU	CRBU	MGAYNOR
11	7	0	2208	QHW	CRBU	CRBU	MGAYNOR

C000065

11	7	0	2250	QPS	IDEN	IDEN	GVENTRE
11	7	0	2328	MDT	4255		
11	8	0	128	QPS	CRBU	CRBU	MGAYNOR
11	8	0	650	QPS	DST4	DST4	DMECE
11	8	0	954	QPS	CT49	CT49	CMOCK1
11	8	0	956	QRA	CT49	CT49	CMOCK1
11	8	0	958	QPS	CT49	CT49	CMOCK1
11	8	0	1258	QHW	DPR4	DPR4	YFAIRBAN
11	8	0	1259	QPS	DPR4	DPR4	YFAIRBAN
11	8	0	1430	QHW	CRB2	CRB2	RUNGER
11	8	0	1431	QCH	CRB2	CRB2	RUNGER
11	8	0	1856	QHW	OPS2	OPS2	MHUDEPOH
11	9	0	34	MDT	5336		
11	9	0	35	MDT	5336		
11	9	0	35	MDT	5336		
11	9	0	735	MDT	7Y31		
11	9	0	738	MDT	7Y31		
11	9	0	738	MDT	7Y31		
11	9	0	738	MDT	7Y31		
11	9	0	738	MDT	7Y31		
11	9	0	738	MDT	8PI3		
11	9	0	738	MDT	8PI3		
11	9	0	830	QHW	NCH2	NCH2	JFULMER
11	9	0	831	QRSP	NCH2	NCH2	JFULMER
11	9	0	831	QD	NCH2	NCH2	JFULMER
11	9	0	1123	QHW	SLV2	SLV2	BPLUMMER
11	9	0	1123	QCH	SLV2	SLV2	BPLUMMER
11	9	0	2350	MDT	1331		
11	9	0	2350	MDT	1331		
11	9	0	2350	MDT	1331		
11	9	0	2350	MDT	1331		
11	9	0	2350	MDT	1331		
11	9	0	2350	MDT	1331		
11	11	0	729	MDT	5132		
11	11	0	730	MDT	5132		
11	11	0	730	MDT	5132		
11	11	0	730	MDT	5132		
11	11	0	730	MDT	5132		
11	11	0	730	MDT	5132		
11	11	0	1423	QCH	CT51	CT51	CMOCK1
11	11	0	1423	QPS	CT51	CT51	CMOCK1
11	12	0	158	MDT	3341		
11	12	0	158	MDT	3341		
11	12	0	158	MDT	3341		
11	12	0	158	MDT	3341		
11	12	0	158	MDT	3341		
11	12	0	158	MDT	3341		
11	12	0	200	MDT	3341		
11	12	0	401	QHW	DST1	DST1	JHENRY
11	12	0	403	QPS	DST1	DST1	JHENRY
11	12	0	408	QRA	DST1	DST1	JHENRY
11	12	0	409	QRA	DST1	DST1	JHENRY
11	12	0	409	QRA	DST1	DST1	JHENRY
11	10	0	9	MDT	4321		
11	10	0	1030	QPS	IDEN	IDEN	JZIEVERI
11	10	0	1030	QHW	IDEN	IDEN	JZIEVERI
11	10	0	1035	QD	IDEN	IDEN	JZIEVERI
11	10	0	1037	QRSP	IDEN	IDEN	JZIEVERI
11	10	0	1110	QCH	RENU	RENU	TGORMLY
11	10	0	1357	QPS	OPS2	OPS2	SMCMANIS
11	10	0	1358	QRA	OPS2	OPS2	SMCMANIS
11	10	0	1440	QPS	CIC1	CIC1	TLYONS
11	10	0	1441	QPS	OPS4	OPS4	JSTAGER
11	10	0	1442	QHW	OPS4	OPS4	JSTAGER
11	10	0	2038	MDT	1221		

C000066